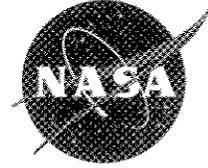


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 19, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the AIAA National Capital Section Luncheon (NCS) on October 30, 2009

On October 30, 2009, the American Institute of Aeronautics and Astronautics National Capital Section (AIAA NCS), a non-profit under section 501(c)(3) of the Internal Revenue Code, will host a luncheon at Pier7/Channel Inn, SW, in Washington, DC., at 11:30 a.m. The luncheon is a monthly event to provide aerospace information to industry, university students, and civil servants. The speaker for the event is Lori Garver, Deputy Administrator for the National Aeronautics and Space Administration (NASA).

Approximately 125 people have been invited and 70 are expected to attend. The estimated cost of the luncheon including all food and beverages is \$17.00 per person. The luncheon will be attended by NASA personnel, representatives of the aerospace industry, trade associations, the media, members of Congress and congressional staffers, academia, and employees of other Federal agencies. I find that this luncheon meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow attendees to the opportunity to discuss science and exploration related issues with other guests. Accordingly, NASA employees whose duties do not substantially affect the event sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the AIAA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone